



**COLUMBIA HELICOPTERS, INC.**

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Columbia Helicopters, Inc. would like to object to eliminating ground rotor strikes from the exemption portion of the current 47 CFR 830.2 definition of "substantial damage" as proposed by NTSB NPRM 427.

Presently, when a ground strike of a rotor blade occurs that damages the rotor blade but nothing else on the aircraft and no one is injured, the event is called an incident. This due to the present exemption in the substantial damage definition that ground strike rotor blade damage does not constitute "substantial damage" for the purpose of reporting. By removing this exemption per the NPRM, this same incident event of today would be called an accident and involve all the actions and costs of a real accident.

The NTSB presently does not have the manpower to investigate all of the "real" accidents that occur now. It is well known that the NTSB does not investigate all the accidents now including some that cause injury or death. A study done by Bell Helicopter shows that the NTSB was not able to make a thorough field investigation in over 82% of all helicopter accidents of which they are presently being notified of. This study shows that the NTSB only does a limited investigation of 26.5% of all fatal helicopter accidents now. This change would only be added to the "No Injury Accidents" group of which the NTSB only goes to the field on 39 of them in the last 10 years.

The cost versus benefit of this NPRM does not meet the burden of Executive Order 12866. By adding ground rotor blade strike to the accident level the helicopter Operator would now have more accidents on his record. This accident record is valuable to the operator. Most customers requiring services from an operator require accident history information. More accidents on the record can cause loss of business opportunities and

have an effect on an operator's ability to purchase insurance, which if they can, the cost can be prohibitive in a very competitive market. Resale value of an aircraft is also devalued if accident history is increased. Loss of revenue due to listing ground strikes as an accident is caused by the fact that the operator can not move the aircraft till the NTSB shows up, does an investigation and releases the aircraft back to the operator.

The cost to a manufacturer is increased when potential customers review the manufacturer's accident history for their models. Inflated accident rates for a manufacturer's model will result in less sales and increased insurance to the operator should they purchase that model. The manufacturer costs also increase due to participating in investigations for each of these "accidents". The time could be better spent investigating the truly fatal accidents which they don't deal with on a regular basis now.

The pilot also suffers. A ground rotor blade strike would now be an accident on his record. A pilot's safety record is important in securing employment and may force a person to not report the strike at all. This would bypass all the reporting requirements in place now.

The whole helicopter industry will suffer for this definition change. It is becoming hard to apply for, build and provide heliports in urban areas. Some people are just naturally opposed to any helicopter use and by providing them an increased accident statistic only adds to their negative ammunition. The US helicopter industry on a whole has a better accident rate than most other countries. As most other countries' regulations tend to emulate US regulations this inclusion of ground rotor blade strikes as an accident will only make the international situation worse.

There seems to be no benefit to society except to the NTSB themselves. They can now claim to be investigating a larger number of accidents. Without physically being at these so-called accident scenes, which the NTSB aren't now in over 80% of helicopter accidents, how can reasonable rule recommendations be formulated. Helicopter manufacturer's have maintenance procedures in place to deal with this type of incident. Specific inspections are called for and repair or replacement can be performed in place with little loss of time. Should a rotor strike cause sudden stoppage and involve the drive train then this drive train damage falls within the substantial damage definition now and is classified as an accident anyway.

As an alternative it would be best that ground rotor blade strikes remain as an incident and be reported as such. Notification of incidents is already required by 830.5(a) and this type of incident, with no other damage or injury, should be reported as an incident. This would satisfy the intent of the NPRM of "direct NTSB notification" and does not carry the full consequence or penalties of being called an accident.

Ground strikes as stated is a vague, confusing definition. What would now constitute a ground strike: anything on the ground, attached to the ground, platforms, helidecks, fence, brush, snow? Right now should this happen the blade is inspected, repaired or

replaced. If found okay or repaired the blade is re-installed and left on till its life-limit is reached. This should not be classified as an accident.

Taking this all into consideration the proposed change in 830.2 to eliminate ground rotor strikes from the exemption portion of the definition of "substantial damage" is not warranted and Columbia Helicopters, Inc. strongly opposes it. This change would increase the number of accidents and increase costs to helicopter operators with no significant safety gain.

CHI recommends no change to 830.2 definitions of "substantial damage".

Regards,

A handwritten signature in black ink, appearing to read "Jim Coates". The signature is fluid and cursive, with the first name "Jim" and last name "Coates" clearly distinguishable.

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